

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS**

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In re: )  
ROBERT N. LUPO, ) Chapter 11  
Debtor. ) Case Nos. 09-21945-WCH  
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**MOTION TO WITHDRAW AS COUNSEL TO THE DEBTOR**  
**(Expedited Determination Requested)**

Hanify & King, Professional Corporation (“Counsel to the Debtor”) moves, pursuant to Local Rule 2091-1(a) to withdraw as counsel to the debtor, Robert N. Lupo (the “Debtor”). Counsel to the Debtor seeks to withdraw their appearance on the basis that there is a fundamental disagreement with the Debtor as to the conduct of the Chapter 11 case, which fundamental disagreement has resulted in an irreconcilable breakdown of the attorney-client relationship. Because of the rupture in the attorney-client relationship, Counsel to the Debtor can no longer effectively represent the Debtor. Expedited determination is requested as the prompt resolution of the subject matter of this motion is necessary to ensure the continued orderly administration of this Chapter 11 case.

WHEREFORE, Counsel to the Debtor respectfully prays that this motion be allowed and they be permitted to withdraw as counsel for the Debtor.

Respectfully submitted,

HANIFY & KING,  
Professional Corporation

By:

/s/ Andrew G. Lizotte

Harold B. Murphy (BBO #362610)  
Andrew G. Lizotte (BBO #559609)  
Natalie B. Sawyer (BBO #660072)

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